

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MICHELE CATALANO,  
Plaintiff,

v.

BRIDGE OVER TROUBLED  
WATERS, INC.,  
Defendant.

Civil Action No. 05-11729 JLT

**DEFENDANT'S LIST OF INDIVIDUALS IT WISHES TO DEPOSE**

Pursuant to the Court's Discovery Order dated February 21, 2006, Defendant, Bridge Over Troubled Waters, Inc. ("Bridge"), submits that it would like to depose at least the following individuals in connection with this matter:

1. Plaintiff, Michele Catalano
2. Jesse Auth
3. Maureen Bruce
4. Lorraine Foster
5. Peter Hubbard
6. Karen Perella
7. Chris Woodman

In Plaintiff's Initial Disclosures, she identified three former employees of Casa Myrna Vazquez, Emily Davis, Dorian Loza, and Susan Merong, as individuals with knowledge of the hiring practices at Casa Myrna Vazquez. Bridge's Executive Director, Shiela Y. Moore, was the Executive Director at Casa Myrna Vazquez prior to working at Bridge. At this time, it does not appear that these individuals have knowledge relevant to this matter. If it becomes apparent that these individuals do have relevant knowledge, Bridge may reconsider whether it would like to depose them.

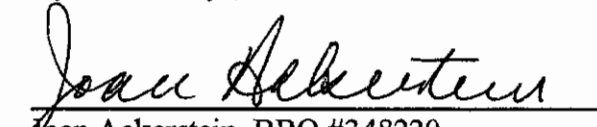
In her Initial Disclosures, Plaintiff also identified three former Bridge employees, Fran Camasso, Christine Lowe, and Henry Oppong, as individuals with knowledge of the hiring practices, grievance procedures, and/or work environment at Bridge. At this time, it does not appear that these individuals have knowledge relevant to the hiring practices in Bridge's Transitional Day Program. If it becomes apparent that these individuals have knowledge that is relevant to this matter, Bridge may reconsider whether it would like to depose them.

Bridge reserves the right to supplement this list of individuals, as necessary.

Respectfully submitted,

BRIDGE OVER TROUBLED WATERS, INC.

By its attorneys,



Joan Ackerstein, BBO #348220

Heather L. Stepler, BBO #654269

JACKSON LEWIS LLP

75 Park Plaza

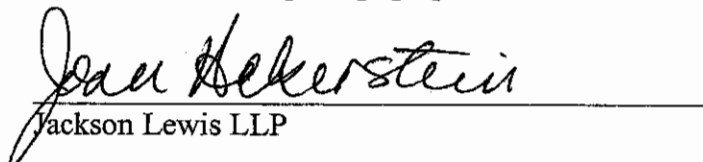
Boston, MA 02116

(617) 367-0025

Dated: March 16, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of March, 2006, a copy of the foregoing was served on Hillary Schwab, Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., 18 Tremont Street, Suite 500, Boston, MA 02108 by facsimile and first-class mail, postage prepaid.



Jackson Lewis LLP